

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware  
Corporation,

Plaintiff,

vs.

ROXANNE MOTAMEDI, an individual,

Defendant.

Case No. 2:16-cv-1892

DECLARATION OF TINA M. AIKEN IN  
SUPPORT OF PLAINTIFF'S MOTION  
TO REDACT

Hearing Date: February 24, 2017

1. My name is Tina M. Aiken. I am an attorney representing Plaintiff Getty Images, Inc. ("Getty Images"). I have personal knowledge of the following facts.

2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the January 12, 2017 preliminary injunction hearing, with proposed redactions. Specifically, Getty Images's proposes the following redactions:

- Page 7, Lines 19-20: "Clients can be like [redact client's name], it can be websites, it can be TV shows, just any - - [redact client's name]."
- Page 8, Line 14: "I don't know, dealing with clients at [redact clients' names], all of these people, anyone in that industry."
- Page 8, Lines 16-17: "And all the things you just listed, [redact clients' names], those are clients..."
- Page 9, Lines 1-2: "...Getty Images owned, I would say, [redact confidential business information] of the market..."

DECLARATION OF TINA M. AIKEN - 1

SEBRIS BUSTO JAMES  
14205 S.E. 36th Street, Suite 325  
Bellevue, Washington 98006  
Tel: (425) 454-4233 – Fax: (425) 453-9005

- 1 • Page 9, Line 23: “Of the clients that we talked about, that photo agencies can potentially
- 2 work with, [redact client’s name], et cetera...”
- 3 • Page 17, Line 5: “I set up a meeting for him with a photographer by the name of [redact
- 4 contributor’s name], who was a freelance photographer...”
- 5 • Page 17, Line 7: “After the meeting, the next day or so, [redact contributor’s name]
- 6 told me that he wasn’t interested.”
- 7 • Page 17, Lines 10-11: “[redact contributor’s name] was another photographer, but I did
- 8 not set up that meeting. [redact contributor’s name] had reached out directly to Nick.”
- 9 • Page 17, Line 21: “And you mentioned [redact contributor’s name].”
- 10 • Page 18, Lines 14–15: “I think a few questions ago we had discussed [redact
- 11 contributor’s name] and [redact contributor’s name].”
- 12 • Page 18, Line 16: “[redact contributor’s name]. Uh-huh.”
- 13 • Page 18, Line 22: “[redact client’s name].”
- 14 • Page 18, Line 24: “And what did you discuss with Nicholas Evans-Lombe about [redact
- 15 client’s name].”
- 16 • Page 19, Line 1: “[redact client’s name].”
- 17 • Page 28, Line 16: “You went to New York in either late October or November for the
- 18 ostensible purpose of introducing [redact contributor’s name] to your replacement at
- 19 Getty Images, correct?”
- 20 • Page 28, Line 21: “And did you have a meeting with [redact contributor’s name] while
- 21 you were there?”
- 22 • Page 29, Line 18: “I don’t remember if it was October or November, when I set up a
- 23 meeting for [redact contributor’s name] to meet with Nick Evans-Lombe.”
- 24 • Page 30, Lines 4–5: “I had set up the meeting with [redact contributor’s name] to meet
- 25 with him.”
- 26 • Page 33, Lines 19-20: “Your testimony, when you were responding to your counsel’s
- 27 questions about [redact client’s name], is that you thought it would be interesting for
- 28 SilverHub to get [redact client’s name].”

DECLARATION OF TINA M. AIKEN - 2

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- 1 • Page 34, Line 1: “[redact client’s name] and pushing him to get [redact client’s
- 2 name]?”
- 3 • Page 34, Lines 2-3: “Nick was very familiar with [redact client’s name] and the
- 4 importance of [redact client’s name] and [redact client’s name].”
- 5 • Page 34, Lines 21-23: “I told him - - you know, he - - basically, [redact client’s name], I
- 6 think, told him that he didn’t have the content. [redact confidential business
- 7 information], and SilverHub simply doesn’t have - - it’s made up of very few
- 8 employees.”
- 9 • Page 35, Line 6: “I think, when I send that e-mail about [redact client’s name], it was,
- 10 not only a stupid move, but it was only a test for me . . .”
- 11 • Page 54, Lines 12-14: “One of the documents, for example, that she sent to her home e-
- 12 mail is a document involving Getty’s [redact confidential business information]. It
- 13 provides a cutting edge to Getty Images.”
- 14 • Page 69, Lines 24-25: “He identified the [redact confidential business information] and
- 15 some strategic plan. Now, regarding the [redact confidential business information],
- 16 my client testified at deposition...”

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18 I declare under the penalty of perjury under the laws of the United States that the

19 foregoing is true and correct.

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21 DATED this 16<sup>th</sup> day of February, 2017, at Bellevue, Washington.

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24 Tina M. Aiken, WSBA #27792

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